

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB  MDL No. 2323
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i>  Plaintiffs,  v.  National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc.,  Defendants.	Civ. Action No.: 14-cv-00029-AB
THIS DOCUMENT RELATES TO: ALL ACTIONS	

**STIPULATION AND [PROPOSED] ORDER APPROVING  
SETTLEMENT CLASS SUPPLEMENTAL NOTICE<sup>1</sup>**

This Stipulation and Agreement is made this 25th day of January 2017, by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Co-Lead Class Counsel.

WHEREAS, on January 7, 2017 the Settlement became Effective;

WHEREAS, the Settlement Agreement provides in Section 14.1(d) for the dissemination of a Settlement Class Supplemental Notice by first-class mail, by posting on the Settlement Website and through the automated telephone system, to advise

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<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

Settlement Class Members of the previously disclosed deadlines: (i) to register for participation in the Class Action Settlement; (ii) to participate, if eligible, in the BAP; and (iii) to submit Claim Packages or Derivative Claim Packages.

WHEREAS, the Settlement Agreement further provides in Section 14.1(d) that the Settlement Class Supplemental Notice may include additional information as agreed upon by Co-Lead Class Counsel and Counsel for the NFL Parties, and approved by the Court.

WHEREAS, on January 19, 2017, the NFL Parties and Co-Lead Class Counsel previously submitted to the Court a Stipulation and Proposed Order Approving Settlement Class Supplemental Notice. (Doc. No. 7086).



WHEREAS, on January 23, 2017, the Court denied the Stipulation and Proposed Order Approving Settlement Class Supplemental Notice, and directed submission “of a revised Proposed Settlement Class Notice, focused on class member registration, on or before January 25, 2017.” (Doc. No. 7100).

WHEREAS, the NFL Parties and Co-Lead Class Counsel have revised the proposed Settlement Class Supplemental Notice to focus on class member registration. In particular, the NFL Parties and Co-Lead Class Counsel propose a one-page cover sheet emphasizing the importance of and the deadline for registration and a multi-page notice providing more guidance about the registration process along and with a simple timeline presenting the deadlines for registration and to claim benefits under the Settlement Program.

Accordingly, the NFL Parties and Co-Lead Class Counsel submit for review and approval by the Court the revised proposed Settlement Class Supplemental Notice which is attached hereto as Exhibit "A".

**AND NOW**, this 25th day of January, 2017, it is hereby stipulated and agreed by the NFL Parties and Co-Lead Class Counsel that the revised proposed Settlement Class Supplemental Notice be approved by the Court.

**It is so STIPULATED AND AGREED,**

By:  By: Brad S. Karp   
Date: 1/25/17 Date: 1/25/17

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*Co-Lead Class Counsel*

*Counsel for the NFL Parties*

It is so **ORDERED**, this \_\_\_\_ day of \_\_\_\_\_, 2017, that the content of the Settlement Class Supplemental Notice is **APPROVED** and that the Settlement Class Supplemental Notice may be disseminated to the Settlement Class as provided in the Settlement Agreement.

\_\_\_\_\_  
ANITA B. BRODY, J.

Copies **VIA ECF** on \_\_\_\_\_ to:

Copies **MAILED** on \_\_\_\_\_ to: